

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**ALVA JOHNSON,
Individually and On Behalf of All Others
Similarly Situated,**

Plaintiff,

Case No. 8:19-cv-00475-WFJ-SPF

v.

**DONALD J. TRUMP,
In his Individual Capacity and
DONALD J. TRUMP FOR
PRESIDENT, INC.**

Defendants.

**STIPULATED MOTION TO STRIKE
REQUEST FOR INJUNCTIVE RELIEF FROM PLAINTIFF’S COMPLAINT**

Plaintiff Alva Johnson (“Plaintiff”) and defendants Donald J. Trump and Donald J. Trump for President, Inc. (“Defendants” and collectively with Plaintiff, the “Parties”) hereby request that the Court enter an Order pursuant to their joint agreement and stipulation to strike the following portions of Plaintiff’s Complaint this action [Dkt. No. 1] (the “Complaint”) as follows:

1. **Page 33, Paragraph 133:** “Plaintiff prays this Court will enter an order prohibiting Donald J. Trump from grabbing, kissing or otherwise assaulting or harassing women without prior express consent.”

2. **Page 36, Prayer for Relief, Paragraph 1:** “For an injunction prohibiting Donald J. Trump from grabbing, kissing or otherwise assaulting or harassing women without prior express consent.”

The Parties' agreement to strike these portions of the Complaint shall not be construed as a waiver of any legal or factual argument or position relating to this case.

WHEREFORE, the Parties jointly request that the Court strike the foregoing portions of the Complaint, enforce the terms of this stipulation during the pendency of this action, and grant such further relief as the Court deems appropriate.

Dated this 10th day of May, 2019

Respectfully Submitted,

/s/ Hassan A. Zavareei

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 10, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will electronically send a notice of electronic filing upon the following:

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